

1 CYNTHIA L. JOHNSON, (Bar No. 014492)
2 Law Office of Cynthia L. Johnson
3 11640 East Caron Street
4 Scottsdale, AZ 85259
5 Phone: (480) 381-7929
6 Email: cynthia@jsk-law.com

7 *Attorney for Secured Creditor*

8 **IN THE UNITED STATES BANKRUPTCY COURT**

9 **FOR THE DISTRICT OF ARIZONA**

10 **In Re:**

11 **DESERT VALLEY STEAM CARPET
CLEANING LLC,**

12 **Debtor.**

13 **Chapter 7**

14 **Case No. 4:17-bk-13309-SHG**

15 **NOTICE OF MOTION FOR RELIEF
FROM AUTOMATIC STAY**

16 NOTICE IS HEREBY GIVEN that on the 13th day of November, 2017 that Atlas
17 Residential, LLC, an Arizona Limited Liability Company (“Atlas”), by and through
18 undersigned counsel, filed its Motion for Relief From The Automatic Stay, the details of
19 which are as follows:

20 Movant asserts that it has cause to lift the Automatic Stay in that Respondent
21 has been collecting rents and failed to make the mortgage payments, pay property
22 taxes or provide proof of property insurance; that Respondent has no equity in the
23 real property and there is no reasonable likelihood of reorganizing this Chapter 7 debt
24 which are the subject of the Motion for Relief from Stay. Therefore, Movant is entitled
25 to an Order Lifting Stay with respect to such property.
26
27

FURTHER NOTICE IS HEREBY GIVEN that pursuant to Local Bankruptcy Rule 4001 if no objection is filed with the court and a copy served on Movant whose address is:

Atlas Residential, LLC
c/o Cynthia L. Johnson, Esq.
Law Office of Cynthia L. Johnson
11640 E. Caron Street
Scottsdale, AZ 85259
cynthia@jsk-law.com

WITHIN 14 DAYS of service of the motion, the motion for relief from the automatic stay may be granted without further hearing.

RESPECTFULLY SUBMITTED this 13th day of November, 2017.

CYNTHIA L. JOHNSON

By:/s/*Cynthia L. Johnson*

Cynthia L. Johnson
Attorney for Movant

COPY of the foregoing mailed or served
via (email or fax* or electronic notification** if so marked)
this 13th day of November, 2017 to:

**Office of the U.S. Trustee
230 N. 1st Avenue
Suite 204
Phoenix, AZ 85003

**Mr. Stanley J. Kartchner
United States Trustee
7090 N. Oracle Rd.
Suite 178-204
Tucson, AZ 85704
Trustee

1 Desert Valley Steam Carpet Cleaning LLC
2 108 E. 8th Street
3 Eloy, AZ 85131
4 *Debtor*

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By: /s/Cynthia Johnson